

# **EXHIBIT C**

IN RE CATHODE RAY TUBE (CRT)	)	MDL NO. 1917
ANTITRUST LITIGATION	)	
	)	Case No. 07-cv-5944-JST
	)	
This Document Relates to:	)	
	)	
Indirect Purchaser Class Action	)	<b>DECLARATION OF JAN DE</b>
	)	<b>LOMBAERDE</b>
	)	
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	)	
	)	
	)	The Honorable Jon S. Tigar
	)	

DECLARATION OF JAN DE LOMBAERDE  
MDL No. 1917; Case No. 07-cv-5944-JST

1 I, Jan De Lombaerde, declare as follows:

2 1. I am a former employee of Philips Consumer Electronics (“Philips”). I worked at  
3 Philips from 1973 until my retirement in 2009. During the period from 2001 until 2007, I was the  
4 General Manager of Supply Based Management CRT Displays for Philips. In that role, I was the  
5 global head of CRT purchasing for Philips’ television business. I have personal knowledge of the  
6 facts set forth herein, and if called as a witness, I could and would competently testify thereto.

7 2. Attached hereto as Attachment A are copies of the following documents:

8 a. PHLP-CRT-154896-98

9 b. PHLP-CRT-155234-36

10 c. PHLP-CRT-172663-67

11 The documents listed in Paragraph 2 and on Attachment A are collectively referred to in this  
12 declaration as “the Records.”

13 3. I am the author and/or recipient of the emails reflected in the Records, and I have  
14 personal knowledge of the matters reflected in those emails. The Records appear to be true and  
15 correct copies of emails that I sent or received in the regular course of business as part of my job  
16 at Philips. I sent or received those emails at or near the time of the occurrence of the matters set  
17 forth in the emails. I kept and maintained these emails in my files as a regular practice as part of  
18 my job at Philips.

19 4. From approximately 2003 to 2007, Philips contracted with Chinese television  
20 manufacturer TCL to manufacture Philips Magnavox-brand televisions as an Original Equipment  
21 Manufacturer (“OEM”) for Philips.

22 5. Pursuant to Philips’ OEM agreement with TCL, Philips decided which CRTs to  
23 purchase for each television model and negotiated the CRT prices and the allocation of Philips’  
24 business with the CRT manufacturers. Philips’ engineers and technicians also tested and  
25 approved the CRTs for quality and compatibility with each television model. TCL purchased the  
26 CRTs and manufactured the televisions in accordance with Philips’ requirements, and Philips  
27 then purchased the televisions from TCL and sold them to customers, such as retailers.

3           7.       My subordinates at Philips communicated directly with Irco regarding its CRT  
4 prices, its allocation of Philips' CRT business, the technical specifications of its CRTs, and the  
5 testing of its CRTs for quality and compatibility with the Philips televisions manufactured by  
6 TCL.

8. Irico knew which television models its CRTs were incorporated into by TCL because Philips employees provided them with that information, and Irico was involved in testing and adjusting its CRTs for compatibility with the television models.

9. Irico also knew the country to which the televisions containing its CRTs would be sold because Philips employees provided them with that information, and each country had different safety requirements and broadcasting standards which impact the manufacture of the CRTs. For example, CRTs inside televisions sold to the United States had to be U.L. certified and compatible with NTSC/ATSC broadcasting standards.

10. As reflected in the Records, Irico supplied CRTs for Philips Magnavox brand televisions manufactured for the United States market. TCL sold those televisions to Philips and Philips sold the televisions to retailers and other customers throughout the United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 31st day of October 2023, at Tongeren, Belgium.

*Jan De Lombaerde*  
Jan De Lombaerde